REMARKS

This is in response to the first Office Action (Paper No. 6) of July 15, 2003. By this Amendment, claim 13 has been amended. Thus claims 2-13 remain in the application for further examination. Claim 13 is the only independent claim.

Applicant would like to acknowledge a telephone discussion between attorneys of the undersigned firm and Examiner Van Nguyen regarding an interview. An interview was requested but Examiner Nguyen suggested that a formal claim amendment be filed first and, if the Amendment does not place the application in condition for allowance, the Examiner will telephone undersigned attorneys to schedule an interview.

In the first Office Action, claim 13 was rejected under 35 U. S. C. § 112, second paragraph, as being indefinite. It is believed that the claim amendments avoid the lack of antecedent basis objections. The Examiner stated that the limitation "telecommunication services" is vague and indefinite. Reconsideration is requested. The term "telecommunication services" may be broad but it is not at all vague or indefinite. The present invention relates to a telecommunication controller that controls telecommunication services generally. The specific type or nature of the telecommunication services forms no part of the invention *per se*. The present invention is for controlling and interfacing with telecommunication services of any appropriate type.

The overall field of the invention relates to telecommunication controllers with all the attendant real time signaling that such a field entails. The invention is defined in independent claim 13 with the following terms:

> application domain level with control logic domain objects having object classes,
>
> meta objects (in a meta level) which:
>
> > represent the domain object classes, and
> >
> > interface with telecommunication services to isolate the domain objects from the services.

Because the meta level represents the domain object classes and isolates the domain objects from the telecommunication services with which it interfaces, domain objects may be added, deleted, or modified without the need to directly notify other domain objects. The meta level effectively tracks the structure of the domain objects. The meta level further interfaces with the telecommunication services and thus modifications to the services may be implemented transparently to the domain objects.

In the first Office Action, the independent claim 13 was rejected as unpatentable over the Hayes-Roth publication. Claims 3-10 were also rejected over Hayes-Roth. However, Hayes-Roth is very different from the invention as described in the present application and as claimed in claim 13.

Hayes-Roth is a general discussion paper on high-level concepts for controllers. Although several types of control situations are listed, importantly the list does not include the telecommunications field. Certainly the latter would have been included in the list if it were obvious. The only specific fields described in any detail are defense systems. It is respectfully submitted that one of ordinary skill in the art would not be motivated to look to a document primarily relating to defense system controllers for guidance on development of a telecommunication controller.

Although Hayes-Roth uses some language such as "framework", "domain", and "meta" which is similar to language of the present patent application, the structure and operation of the components of the Hayes-Roth controller are completely different from the present invention. For example, there does not appear to be any disclosure in Hayes-Roth of a domain level comprising control logic domain objects having object classes. The Hayes-Roth domain level has modular functions, but no disclosure or suggestion of object classes.

In addition, the "meta-controller" of Hayes-Roth does not have objects which represent the domain object class. Also, the "meta-controller" of Hayes-Roth does not interface with any services, particularly not telecommunication services. Hayes-Roth discloses (Fig. 3) functions of the domain level interfaces with items e.g., "Messages to Siblings" and "Messages to and from IB/WM". However, from what we can understand in Hayes-Roth the meta controller only interfaces with the domain controller and there is no disclosure or suggestion of interfacing with any services, much less telecommunication services.

In the first Office Action the Examiner rejected dependent claims 2, 11 and 12 as unpatentable over Hayes-Roth in view of the Rubin patent No. 5,155,842. However, Rubin fails to disclose the overall inventive concepts of the independent claim 13 and its inclusion with the Hayes-Roth

publication, even if the references could be combined, do not disclose the present invention of claim 13. Accordingly, the combination does not disclose the subject matter of the dependent claims.

The various dependent claims include features that should be carefully considered and each provide a separate basis for patentability.

Thus, this application is now in condition for allowance. Should the Examiner have any questions after reviewing this Amendment, the Examiner is cordially invited to telephone the undersigned attorneys so that an early Notice of Allowance can be received. In the absence thereof, an interview is requested.

Respectfully submitted,

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